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September 18, 2015

BY ECF

Honorable Robert W. Sweet
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Schoolcraft v. City of New York, et al., 10-cv-6005 (RWS)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, assigned to represent the City Defendants in the above-referenced matter. We write to respectfully request a page limit extension for the Memorandum of Law in Support of City Defendants' Motions *In Limine* from 25 to 50 pages, and to separately file a motion to preclude the testimony of four experts, in whole or in part, with a 25 page memorandum.

Plaintiff has listed over 200 exhibits and 56 witnesses, including 4 expert witnesses, in his JPTO. The medical defendants offer three experts. In contrast, City Defendants do not offer any expert witnesses. In light of the large number of exhibits and witnesses listed by plaintiff, the need for expert-related motions, and the complexity of the issues in the case (including *Monell* issues), the City Defendants believe that an increase in the Court's usual page limits are required.

We have conferred with the other parties and although plaintiff agreed to a 50 page limit for motions *in limine*, plaintiff has not responded to our request to file a separate motion directed at the preclusion of expert witness testimony. Given the large number of plaintiff experts, requiring expert motions to be included within the same page limit as other motions would be unfair to the City defendants, who will be making motions directed at several expert witnesses.

Hon. Robert W. Sweet, U.S.D.J.

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Accordingly, the City Defendants respectfully request a page limit extension for the Memorandum of Law in Support of City Defendants' Motions *In Limine* from 25 to 50 pages and a 25 page limit for a separate Memorandum of Law in Support of City Defendants' Motions to Preclude Expert Testimony.

We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Alan Scheiner

Alan Scheiner
Senior Counsel

cc: All counsel (*via* ECF)